

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

*In Re: Methyl Tertiary Butyl Ether (“MTBE”)
Products Liability Litigation*

**Master File No. 1:00 – 1898
MDL 1358
M21-88**

ORAL ARGUMENT REQUESTED

This Document Relates To:

*Commonwealth of Pennsylvania, et al. v. Exxon
Mobil Corp., et al.,*

No. 1:14-CV-06228-VSB-DCF

PLEASE TAKE NOTICE that under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), PJSC LUKOIL (“PJSC”) hereby moves to dismiss the Second Amended Complaint filed against it in the above-captioned action for lack of personal jurisdiction and for failure to state a claim, and for such other and further relief as the Court determines to be just and proper. This motion is made upon the accompanying Declaration of Anatoly Martynov sworn to on September 29, 2021;¹ the accompanying Memorandum of Law in support; and any reply brief and/or oral argument that may be submitted or made by PJSC in support of this motion.

PLEASE ALSO TAKE NOTICE that under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), LUKOIL Pan Americas LLC (“LPA”) hereby moves to dismiss the Second Amended Complaint filed against it in the above-captioned action for lack of personal jurisdiction and for failure to state a claim, and for such other and further relief as the Court determines to be just and proper. This motion is made upon the accompanying Declaration of

¹ PJSC’s Motion to Dismiss under 12(b)(6) in no way relies on the factual information contained in the Declaration of Anatoly Martynov.

Stephen Wolfe sworn to on October 1, 2021;² the accompanying Memorandum of Law in support; and any reply brief and/or oral argument that may be submitted or made by LPA in support of this motion.

PLEASE ALSO TAKE NOTICE that under Federal Rule of Civil Procedure 12(b)(6), LUKOIL North America LLC (“LNA”) hereby moves to dismiss the Second Amended Complaint filed against it in the above-captioned action for failure to state a claim, and for such other and further relief as the Court determines to be just and proper. This motion is made upon the accompanying Memorandum of Law in support and any reply brief and/or oral argument that may be submitted or made by LNA in support of this motion.

Dated: October 1, 2021

Respectfully submitted,

/s/ Joseph L. Sorkin

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² LPA’s Motion to Dismiss under 12(b)(6) in no way relies on the factual information contained in the Declaration of Stephen Wolfe.